

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

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CHEVRON U.S.A. INC., <i>et al.</i> ,	)	
	)	
	)	
Plaintiffs,	)	
	)	No. 20-1784
v.	)	(Senior Judge Lettow)
	)	
THE UNITED STATES,	)	
	)	
Defendant.	)	
_____	)	

**JOINT MOTION TO AMEND DISCOVERY SCHEDULE**

Pursuant to Rule 6(b) of the Rules of the United States Court of Federal Claims, Plaintiffs Chevron U.S.A. Inc., Texaco Downstream Properties Inc., and Union Oil Company of California, and Defendant, the United States, respectfully submit this joint motion to amend the scheduling order. The parties respectfully request a modified scheduling order to extend fact discovery by six months, or until February 1, 2024. Under the current discovery schedule, fact discovery closes on August 1, 2023.

The parties are in the process of exchanging documents and expect to continue exchanging documents into 2023. Indeed, defendant is expecting a significant document production from plaintiffs very soon. The parties agree that additional time is needed for fact discovery to ensure that the parties have adequate opportunity to review their respective document productions and, if necessary, conduct additional fact discovery. Towards this end, the parties propose to extend the deadline to complete fact discovery by six months, from August 1, 2023 to February 1, 2024, without extending the remainder of the schedule. The deadlines for expert discovery would remain unchanged.

For the reasons stated above, the parties respectfully submit the following proposed amended discovery schedule:

February 1, 2024	Close of fact discovery;
August 1, 2024	Deadline for Plaintiffs to designate affirmative expert witnesses and provide report(s) required by RCFC 26(a)(2);
October 1, 2024	Deadline for Defendant to designate expert witnesses and provide report(s) required by RCFC 26(a)(2);
November 15, 2024	Deadline for Plaintiffs to designate rebuttal expert witnesses and provide rebuttal expert report(s); and
January 15, 2025	Close of expert discovery and completion of expert witness depositions.

Respectfully submitted,

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